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April 6, 2021

By CM/ECF Posting

The Honorable Mary Kay Vyskocil
United States District Court
for the Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

Re: *Shabtai Scott Shatsky, et al. v. The Palestine Liberation
Organization, et al.*, Case No. 18 Civ. 12355 (MKV)

Dear Judge Vyskocil:

We represent Plaintiffs in this action. By order dated February 8, 2021, Your Honor authorized Plaintiffs to take jurisdictional discovery from Defendants, directed the parties to complete that discovery by April 9, 2021, directed Defendants to file their anticipated dispositive motions by April 30, 2021 and directed that opposition and reply papers respecting those motions be filed by May 14, 2021 and May 21, 2021, respectively. (Dkt. No. 60). On March 24, 2021, the parties filed two joint letters (the "Pre-Motion Letters"), pursuant to Rule 3(D) of Your Honor's Individual Rules of Practice in Civil Cases (the "Individual Rules"), seeking an informal conference before Your Honor respecting a number of disputes that arose with respect to the jurisdictional discovery that Your Honor authorized. (Dkt. Nos. 65, 66). As the Pre-Motion Letters detail, those disputes -- which remain outstanding -- arise from Defendants' refusal to produce more than minimal documents, or make any witnesses available for deposition, in response to Plaintiffs' jurisdictional discovery requests.

Accordingly, pursuant to Rule 2(G) of the Individual Rules, Plaintiffs respectfully request that Your Honor adjourn the jurisdictional discovery cutoff and briefing deadlines set forth in the February 8 order, pending resolution of the outstanding discovery disputes and further direction from the Court. There have been no prior requests to adjourn or extend any of these deadlines. Defendants' counsel has advised us that Defendants do not consent to this request, for the reasons set forth in their portions of the Pre-Motion Letters.



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Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Stephen M. Sinaiko', with a long, sweeping horizontal line extending to the right.

Stephen M. Sinaiko

cc: All Counsel (by CM/ECF Posting)